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February 28, 2005

Honorable James H. Welsh
Commissioner of Conservation
State of Louisiana
Post Office Box 94275
Baton Rouge, Louisiana 70804-4275

Re: Miogyp RB SUA
Southeast Gueydan Field
Vermilion Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of TEXAS PETROLEUM INVESTMENT COMPANY for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the Miogyp Sand, Reservoir B for the establishment of rules and regulations and the recreation of a single drilling and production unit for the exploration for and production of gas and condensate from the Miogyp Sand, Reservoir B, Southeast Gueydan Field, Vermilion Parish, Louisiana, said units to be designated MIOGYB RB SUA.

A unit designated MIOGYB RB SUA was established by Office of Conservation Order No. 797-B-1, effective July 6, 1971, and terminated by Supplement to Office of Conservation Order No. 797-B-1, effective December 9, 2003. The applicant has reestablished production from the reservoir and is asking that the unit be reestablished according to the provisions of Statewide Order No. 29-L-3, effective February 20, 2004. The applicant respectfully requests the Commissioner to:

1. To establish rules and regulations and recreate the drilling and production unit created by Office of Conservation Order No. 797-B-1 for the exploration for and production of gas and condensate in the Southeast Gueydan Field, Vermilion Parish, Louisiana, said unit to be designated Miogyp RB SUA
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed units with each tract sharing in unit production on a surface acre basis of participation.
3. To designate Texas Petroleum Investment Company, operator of the proposed unit.
4. To designate the Texas Petroleum Investment Company (formerly Superior Oil Company)-B. D. Hardee No. 1 well as the unit well for the proposed unit.
5. To provide that any future wells drilled to the units proposed herein should be located in accordance with the spacing provisions of Statewide Order No. 29-E.

6. To authorize the Commissioner of Conservation to reclassify the reservoirs by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoirs change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
7. To consider such other matters as may be pertinent.

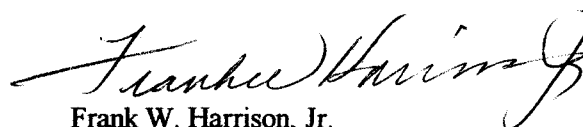
The Miogypsinoides Sand in the Southeast Gueydan Field, Vermilion Parish, Louisiana, was defined in Office of Conservation Order No. 797-B, effective March 4, 1969, as being that gas and condensate bearing sand encountered between the depths of 16,280 feet and 16,392 feet. electrical log measurements, in the Superior Oil Company-Zaunbrecher-Hardee Unit Well No. 2 (formerly Owen-Zaunbrecher-Hardee Unit Well No. 1) located in Section 21, Township 12 South, Range 1 West.

Pertinent data, including well logs, may be obtained AT THE COST OF THE REQUESTING PARTY from Frank W. Harrison, Jr., P. O. Box 51943, Lafayette, Louisiana, 70505, Telephone number (337) 232-4031.

A conference to discuss the proposed application and any opposition thereto was tentatively scheduled for 10:00 A.M. on Monday, March 7, 2005, at the **Petroleum Club of Lafayette**, 111 Heymann Blvd., Lafayette, Louisiana. This conference was not held since a specific request to confer was not made to the writer, either by telephone or in writing, by an Interested Owner or Represented Party within 10 calendar days after the date of the notice of application.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal and a list of names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished only to the Commissioner of Conservation and the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be furnished by the undersigned to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties, and Represented Parties.

Yours very truly,



Frank W. Harrison, Jr.

FWH,Jr./hs
Attachments

cc: Mr. Richard Hudson
Office of Conservation
Brandywine III
825 Kaliste Saloom Road
Lafayette, Louisiana 70508

cc: Interested Owners, Represented
Parties and Interested Parties

